

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal No. 20-cr-40036-TSH
	)	
VINCENT KIEJZO,	)	
	)	
Defendant.	)	

JOINT MOTION TO CONTINUE FINAL STATUS CONFERENCE

Now comes the United States of America and the defendant, Vincent Kiejzo, in a joint request that the final status conference scheduled for January 24, 2022 be rescheduled for a date after March 3, 2022. As reasons therefore, resolution of the defendant's appeal of the denial of his motion to compel discovery is still pending. (ECF #117) The hearing, previously scheduled for February 18, 2022 was continued until March 3, 2022. (ECF #136) The resolution of discovery matters will enable the parties to more accurately report for a final status conference in this case as to the nature of, and time necessary to prepare and file, substantive motions. The government and the defendant agree that the period from Kiejzo's first appearance upon his indictment on October 2, 2020 through March 3, 2022, the date currently set for the motion, was properly excluded by this Court's prior orders on excludable delay and by 18 U.S.C. § 3161(h)(1)(D) [ECF. 25,33, 37, 44, 48, 62, 70,72,86, 102,124,130,136.] The government and the defendant further agree that the time period between March 3, 2022, and the final status conference should be excluded because the parties will use the period of the continuance to complete production and review of discovery, and also to explore a non-trial disposition of the case. Therefore, the parties request that this Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the

defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

VINCENT KIEJZO,  
By his Attorney

RACHAEL S. ROLLINS  
UNITED STATES ATTORNEY

/s/Sandra Gant  
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By: /s/Kristen M. Noto  
Kristen M. Noto  
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Date: February 17, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Kristen M. Noto  
Kristen M. Noto  
Assistant U.S. Attorney

Date: February 17, 2022

